Decommissioning
Do’s and Don’ts

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Benjamin Franklin wrote that “Nothing is certain except death and taxes.”

Although Franklin died long before the first nuclear power reactor started up, his guidance applies.

It is certain that all U.S. nuclear plants will cease operating. The only uncertainty involves when they will do so.
To date, the majority of reactor closures have come years before their operating licenses expired and with very little advance notice.

Many reactors were shut down with plans to restart when their owners determined those costs to be excessive and opted instead for closure.

In very few cases were the reactors’ closures announced years in advance.
Given that nuclear power reactors will certainly close someday and that someday will not likely be scheduled with much notice, it would be beneficial for local and state officials to periodically review plans that would be enacted upon closure to minimize the impacts on the communities.
Decommissioning is touted as dismantling a permanently shut down nuclear power plant so as to permit the site to pursue life after nuclear.
For example, in presentations made many times across the country, the NRC’s pictures showing decommissioning at Maine Yankee suggest a return to green field condition.

What the NRC fails to reveal, or hides, is what appears just off the picture on the left and behind the camera taking the picture on the right.
The “decommissioning” at Maine Yankee did NOT leave behind a green field. It left behind ALL the irradiated fuel produced by the reactor during decades of operation.
Likewise, NRC’s pictures showing decommissioning at Yankee Rowe suggest a return to green field condition.

What the NRC fails to reveal, or hides, or PhotoShops, is the reality.
Virtually all the irradiated fuel produced during decades of reactor operation still remain at the Yankee Rowe “decommissioned” site.
The NRC’s pictures imply that the entire Connecticut Yankee nuclear power plant has been decommissioned and replaced by a dirt moving machine.
The truth, which the NRC apparently seeks to hide from the American public, is that virtually all the irradiated fuel produced by the reactor during decades of operation remains at the plant’s site and will likely remain there for decades to come.
"Decommissioning" is truly only completed when all radioactive material is properly removed from the plant site – not just some of it.

The NRC should not paint distorted and misleading pictures of what decommissioning is, and isn’t.
Nuclear workers are people, too.

The NRC and the nuclear industry must stop treating nuclear workers as two people: people to worry about when necessary to save a nickel or two and people to ignore when necessary to save another nickel or two.
Since before 9/11 and before Fukushima, UCS has advocated reducing the spent fuel pool safety and security risk profile by transferring irradiated fuel into dry storage as expeditiously as possible.

The NRC and the nuclear industry oppose this sane step on purported grounds that it increases the radiation dose to workers performing the transfers.

(Radiation levels decrease over time, so moving irradiated fuel sooner means that the fuel will be emitting higher levels of radiation.)
The NRC’s regulations allow owners to opt to decommission right away or to postpone decommissioning for up to 50 years.

NRC estimates that the radiation levels at 50 years will drop to 1 to 2 percent of the levels today.
Where is the NRC and nuclear industry concern about nuclear workers conducting decommissioning right away when radiation levels are way higher?

Worker radiation doses is not a concern to either the NRC or the nuclear industry. It is only a lame excuse trumped up to fight taking sensible steps to better manage the risk from onsite spent fuel storage.
The alleged concern by the NRC and the nuclear industry about radiation dose to workers conducting spent fuel transfers is a pathetic and irresponsible.

If the NRC and the nuclear industry were also concerned about radiation dose to workers conducting decommissioning right away, they would be consistent and credible.

But they are not.
It is incongruous that in a time when we cannot board a commercial airliner with more than three ounces of shampoo, we set tons of spent fuel out on open pads inviting disaster.

The Oklahoma City bombing and 9/11 demonstrate that sometimes disaster accepts the invitation.
What’s missing from this picture?

Targets on the sides of the casks inviting saboteurs to “HIT HERE FOR MAYHEM.”
Just as we stride to prevent saboteurs from boarding airliners with too much shampoo, we should also implement anti-sabotage barriers around spent fuel casks.
The barriers can literally be dirt cheap – earthen berms that take away line-of-sight access to dry casks.

So, what is truly missing from the picture of dry casks on open pads is the protective barrier surrounding them.

We can, and must, remedy this security shortcoming before someone exploits. We’d certainly take these steps after a dry cask disaster – why not take them now and skip the step where many Americans suffer avoidable harm?
Legally and morally, the federal government is obligated to provide for permanent disposal of spent fuel.

Illegally and immorally, the federal government has instead left spent fuel scattered about the country (despite the NRC’s misleading pictures to contrary).
And while the federal government has issued licenses to new reactors and issued renewed licenses to dozens of old reactors to produce even more spent fuel, the federal government has not licensed a single spot for this large and growing inventory of spent fuel to go.

So, it sits scattered across the country, giving saboteurs a choice of communities to target and harm.
Our taxes pay the salaries of federal government workers.

We should insist that these federal workers fulfill their legal and moral obligations in return for the money we pay them.
This relatively unused structure could easily hold all the dry casks from across the country with space to spare.

And they could establish security measures that prevent people from wandering inside with more than four ounces of shampoo to ensure its safe storage.